REMARKS

Present Status of the Application

The Office Action rejected Claim 1 under 35 U.S.C. 102(e) as being anticipated by Reynolds (US 20020104246A1, hereinafter "Reynolds").

In addition, the Office Action rejected Claims 2-6, 8, 10-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over by Reynolds (US 20020104246A1, hereinafter "Reynolds") in view of Stout et al. (US 006612874B1, hereinafter "Stout")

Claims 1-13 remain pending in the present application, and reconsideration of those claims is respectfully requested.

Discussion of Office Action Rejections

The Office Action rejected Claim 1 under 35 U.S.C. 102(e) as being anticipated by Reynolds (US 20020104246A1, hereinafter "Reynolds").

Applicants respectfully traverse the rejections for at least the reasons set forth below.

In regards to Claim 1, the element "memory module" in Claim 1 is not taught in Reynolds. Although the Examiner has alleged in the Office Action that Reynolds has a memory module as element (69), 69 is **actually** defined as "Advertising cards 69" in Paragraph [0073] and in FIG. 12 in Reynolds. It is to be specially noted that the advertising card is visibly a large card that almost fills the entire display surface area as shown in FIG. 12 in Reynolds.

In Paragraph [0074] in Reynolds, it is mentioned that "[t]he interior slot formed by the

inner edges of circuit board 102 forms a support receptacle for card 69." However, the card 69 is only merely a card of signage **and not** a memory module to be inserted into the interior slots formed by the inner edges of the circuit board 102. Therefore, there is no implied / inherent / implicit meaning that the card is a memory module that is to be connected to the circuit board 102 in any manner, since the circuit board 102 is used to be **coupled and electrically connected to the display lights 52**. The aforementioned circuit board 102 coupling with the display lights 52 is fully described in Paragraph [0073] in Reynolds: "The frame 64 **can include an electrical circuit** 70, as before, which is **coupled to and electrically powers the several display lights** 52 and **may take the form of electrical circuit board 102** in FIG. 18."

In addition, the display card 18, which is similar to the card 69 above, is also illustrated in FIG. 1 in Reynolds. As clearly seen by the "SUPER BUY $ 1.29" text shown on the display card 18 in FIG. 1 in Reynolds, the display card 18 is meant to describe a regular display card used as an advertising signage which covers an entire display surface as illustrated in FIG. 1 in Reynolds. Therefore, the advertising card 69 is similar to the display card 18 and **is clearly** a signage card, **and not** a memory module. Additional reasons why the advertising card 69 would not be a memory module are as follows: 1) a memory module would not be occupying the entire display area as the advertising card 69 does in FIG. 12 of the present invention, 2) as shown in FIGs. 1 and 11, a memory module would not be able to display ""SUPER BUY $ 1.29" by itself without having some type of display module on the surface; and since no display module like a LCD display panel is present over the advertising card 69, the assertion that the advertising card 69 is a

memory module is invalid, and 3) there is no description of the advertising card 69 to be defined as any combinations of memory devices for storing and displaying data.

As a result, Claim 1 is patentable over Reynolds based upon the patentability of the memory module, therefore, Claim 1 should be allowed.

In addition, the Office Action rejected Claims 2-6, 8, 10-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over by Reynolds (US 20020104246A1, hereinafter "Reynolds") in view of Stout et al. (US 006612874B1, hereinafter "Stout")

Applicants respectfully traverse the rejections for at least the reasons set forth below.

Regarding dependent Claims 2-6, 8, 10-13, the same "memory module" referred back to the independent Claim 1 of the present invention as discussed above is not taught in Reynolds. As a result, there is insufficient motivation for a person skilled in the art to use Reynolds at all to combine with Stout. As described in MPEP 2143.01, "[t]here are three possible sources for a motivation to combine references: the nature of the problem to be solved, the teachings of the prior art, and the knowledge of persons of ordinary skill in the art." In re Rouffet, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998)." The nature of the problem to be solved is to be focused on providing an interface apparatus with a rotational mechanism comprising a "**memory module**". Furthermore, persons of ordinary skill in the art in the field such as electronic peripheral manufacturers for the manufacturing of the above interface apparatus would not be motivated to seek out the cited reference of Reynolds because Reynolds teaches of

a **lighted display** device using **signage cards** for **advertising** purposes, and is mounted typically on **conventional display cabinets** such as soda machines as shown in FIG. 11 in Reynolds. The knowledge of person of ordinary skill in the art of the present invention is not likely to extend over to an art focused on the know-how of "**lighted display** device using **signage cards** for **advertising** purposes mounted on display cabinets".

As a result of the above traversal, the cited reference of Reynolds is not applicable in a rejection under 35 U.S.C. 103(a) in view of Stout.

Teachings from Stout are completely insufficient or lacking to form a rejection under 35 U.S.C. 103(a) over Claim 1 based upon the following:

1) Stout **does not** teach of having **only "a connector"** as claimed in Claim 1 and as taught in FIGs. 2, 6, and 8 of the present invention; Stout teaches instead of having **two connectors** as described in col. 11, lines 25-32 and FIGs. 2, 4, 8, and 9 in Stout.

2) Stout **does not** teach of an interface apparatus **having** a "memory module" but instead teaches of **interconnecting** to a peripheral device such as one having a "memory module". The embodiments of the "connector adapter" in Stout shown in FIGs. 2, 4, 7, 8, and 9 clearly shows an interface apparatus **without** a "memory module" included. FIG. 3 in Stout clear shows the interface apparatus 16 interconnected to an external device such as an antenna 14 as described in col. 6, lines 56-57.

3) Stout teaches of a housing interconnecting two connectors as described in Col. 11, lines 33-35 in Stout; whereas, the present invention teaches of a body coupled to only one connector as shown in FIGs 2, 6, and 8 of the present invention.

4) Stout does not teach of a housing that includes electronic circuitry, as is inherently found in the housing described in Paragraph [0021] of the present invention.

5) The attached five photos of an actual prototype of an embodiment of the present invention in the appendix clearly shows the differences between Stout and the present invention discussed above.

Based upon the above traversal for the patentability of Claim 1 of the present invention over Stout, dependent Claims 2-6, 8, and 10-13 should all be patentable over Stout as well.

Therefore, dependent Claims 2-6, 8, 10-13 should all be allowed.

For at least the foregoing reasons, Applicants respectfully submit that claims 1-13 patently define over Reynolds and Stout, and therefore should be allowed. Reconsideration and withdrawal of the above rejections is respectfully requested.

Appendix

Five photos of an actual prototype of an embodiment of the present invention are as follows:

Customer No.: 31561
Application No.: 10/605,237
Docket No.: 9758-US-PA

CONCLUSION

For at least the foregoing reasons, it is believed that the pending claims 1-13 are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

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